

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MFB Fertility Inc., a Colorado Corporation,)	
)	
Plaintiff,)	Case No. 2023-cv-03854
)	
v.)	Dist. Judge John J. Tharp Jr.
)	
Action Care Mobile Veterinary Clinic, LLC, a)	Mag. Judge Gabriel A. Fuentes
Maryland limited liability company,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR LEAVE TO WITHDRAW AS ADDITIONAL COUNSEL
FOR PLAINTIFF, MFB FERTILITY, INC.**

Pursuant to Local Rule 83.17 of the United States District Court for the Northern District of Illinois, Eastern Division, Gary I. Blackman and Erin M. Mayer of Levenfeld Pearlstein, LLC (collectively, “LP”) hereby move this Court for leave to withdraw their appearances as additional counsel for the Plaintiff, MFB Fertility Inc. (“MFB Fertility”). In support thereof, LP states as follows:

1. On June 19, 2023, Gary I. Blackman and Erin M. Mayer filed their appearances on behalf of the Plaintiff, MFB Fertility. (Dkt. Nos. 4 and 5).
2. On November 27, 2023, Dean D. Niro and Arthur A. Gasey of the firm Vitale, Vickrey, Niro, Solon & Gasey LLP filed their appearances on behalf of the Plaintiff, MFB Fertility. (Dkt Nos. 20 and 21).
3. On February 1, 2024, Nicholas D. Niro of the firm Vitale, Vickrey, Niro, Solon & Gasey LLP filed his appearance on behalf of the Plaintiff, MFB Fertility. (Dkt. No. 30).

4. Plaintiff, MFB Fertility, has been notified of LP's intent to withdraw as additional counsel and does not object.
5. No prejudice will result from LP's withdrawal as additional counsel, as MFB Fertility will continue to be represented by Arthur A. Gasey, Dean D. Niro, and Nicholas D. Niro of the firm, Vitale, Vickrey, Niro, Solon & Gasey LLP.
6. Accordingly, LP seeks leave to withdraw its appearances in this litigation.

WHEREFORE, Levenfeld Pearlstein, LLC respectfully requests that the Court grant its Unopposed Motion for Leave to Withdraw as Additional Counsel for Plaintiff, MFB Fertility, Inc., and grant such additional relief that the Court deems appropriate.

Dated: June 12, 2025

**MFB FERTILITY INC., A COLORADO
CORPORATION**

By: /s/ Gary I. Blackman
One of Its Attorneys

Gary I. Blackman (ARDC # 6187914)
Erin M. Mayer (ARDC #6313447)
LEVENFELD PEARLSTEIN, LLC
120 S. Riverside Plaza, Suite 1800
Chicago, Illinois 60606
(312) 346-8380
(312) 346-8434 (Fax)
gblackman@lplegal.com
emayer@lplegal.com

CERTIFICATE OF SERVICE

I, Gary I. Blackman, an attorney, hereby certify that on June 12, 2025, I caused a true and correct copy of the foregoing to be filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of such filing to all attorneys of record.

/s/ Gary I. Blackman